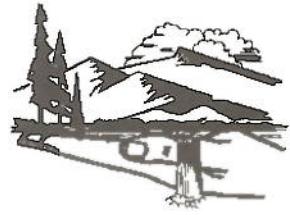




Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.



Mark Gordon, Governor



Todd Parfitt, Director

January 14, 2020

RECEIVED

JAN 16 2020

Mr. Carl Daly
Acting Director, Air and Radiation Division, EPA Region 8
1595 Wynkoop St.
Denver, CO 80202

Re: Initial Notification of April 28, 2019 Stratospheric Ozone Intrusion Exceptional Event

Dear Mr. Daly,

Attached is an initial notification of a stratospheric ozone intrusion exceptional event that occurred in western Wyoming on April 28, 2019 that led to four (4) exceedances of the United States Environmental Protection Agency's (US-EPA) 2015 8-hour ozone National Ambient Air Quality Standard (NAAQS). The Wyoming Department of Environmental Quality – Air Quality Division (WDEQ-AQD) has evaluated the initial notification and circumstances surrounding this event and represents that it should be evaluated by US-EPA Region 8 as a stratospheric intrusion exceptional event. The exceedances covered by this initial notification are summarized in the table below.

Date	AQS ID	Monitor Name	Owner	Daily Max 8-Hour Ozone Concentration (ppm)
4/28/2019	56-013-0099	South Pass	Wyoming DEQ-AQD	0.077
4/28/2019	56-035-1002	Juel Springs	Wyoming DEQ-AQD	0.072
4/28/2019	56-035-0700	Big Piney	Wyoming DEQ-AQD	0.074
4/28/2019	56-037-0300	Moxa	Wyoming DEQ-AQD	0.071

WDEQ-AQD is submitting an "Initial Notification of Potential Exceptional Event" and flagging the data in US-EPA's Air Quality System (AQS) as per 40 CFR §50.14(c) (2) (i) as a result of elevated ozone concentrations. The AQD would like to request that the Administrator determine this possible event meets the provisions of 40 CFR 50.14 (a) (1) (F) as a regulatory determination made on a case by case basis. The WDEQ-AQD considers this event to be of regulatory significance because of the WDEQ-AQD's reliance on ambient data to determine compliance with the NAAQS at state run Special Purpose Monitors (SPM). Additionally, these data are routinely used by the US-EPA and third party interests in evaluating Wyoming's air quality and developing policy. Finally, two (2) of these exceedances (at the Juel Springs and Big Piney stations) occurred within the Upper Green River Basin (UGRB) non-attainment area (NAA) under the 2010 ozone NAAQS. These reasons demonstrate the need to accurately

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portray anthropogenic versus non-anthropogenic or “exceptional” air quality issues to the public by means of excluding exceptional event concurred data from the data record.

It is also the WDEQ-AQD’s stance that any exceedance caused by an exceptional event is significant and that it is important to demonstrate to the public the difference between exceedances that are anthropogenic versus those that are non-anthropogenic or exceptional in nature. Properly characterizing these exceedances in the public record and providing scientific evidence supporting the claim of exceptionality is essential to our shared role of serving the public. These data are used by the public, researchers, and other public agencies to make scientific, public health, and policy decisions. These data must be properly flagged and concurred with in the US-EPA’s AQS in order for those data to be handled correctly and reflect the monitor design values. Without the critical step of determining concurrence, data is often misused by these entities to support policy decisions that may have consequences on a local or national level. Additionally, the numerous exceedances of the 8-hour ozone NAAQS will affect future years design values, with the potential of a NAAQS violation. As two of the exceedances from this event occurred at stations in the UGRB ozone non-attainment area, correctly flagging and characterizing these data in AQS is especially critical.

Due to the above-mentioned factors, the WDEQ-AQD considers these exceedances to meet the criteria of regulatory significance and requests that the Administrator make a determination under 40 CFR 50.14 (a) (1) (F) that the US-EPA will agree to review an exceptional event demonstration for this event.

Please contact Cara Keslar, Monitoring Section Supervisor, with questions at 307-777-8684.

Sincerely,



Darla J. Potter

Air Quality Resource Program Manager

Wyoming Department of Environmental Quality - Air Quality Division

Cc: Cara Keslar, WDEQ-AQD

EE Initial Notification Summary Information

Ozone Exceedances

Submitting Agency: State Of Wyoming- Air Quality Division

Agency Contact: Cara Keslar

Date Submitted: 1/14/2020

Applicable NAAQS: 2015 ozone – 8-hour 0.070 ppm

Affected Regulatory Decision¹: F) Case-by-case basis, please see cover letter.

(for classification decisions, specify level of the classification with/without EE concurrence)

Area Name/Designation Status: Attainment/Unclassifiable (Southern Sweetwater and Fremont Counties); Marginal Nonattainment (2008 NAAQS) and Attainment/Unclassifiable (2015 NAAQS) (Sublette and Northern Sweetwater Counties)

Design Value Period (list three year period): 2017-2019

(where there are multiple relevant design value periods, summarize separately)

A) Information specific to each flagged monitor day that may be submitted to EPA in support of the affected regulatory decision listed above

Date of Event	Type of Event (high wind, volcano, wildfires/prescribed fire, other ²)	AQS Flag	Monitor AQS ID (and POC)	Monitor Name	Exceedance Concentration (with units)	Notes (e.g. event name, links to other events)
8/3/2019	Wildfire Smoke	RT	56-037-0300-1	Moxa	0.074 ppm	Wildfire Smoke Event currently under investigation by AQD as a possible Exceptional Event
4/28/2019	SI	RO	56-013-0099-1	South Pass	0.077 ppm	Stratospheric ozone intrusion exceptional event April 28, 2019
4/28/2019	SI	RO	56-035-1002-1	Juel Springs	0.072 ppm	Stratospheric ozone intrusion exceptional event April 28, 2019
4/28/2019	SI	RO	56-035-0700-1	Big Piney	0.074 ppm	Stratospheric ozone intrusion exceptional event April 28, 2019
4/28/2019	SI	RO	56-037-0300-1	Moxa	0.071 ppm	Stratospheric ozone intrusion exceptional event April 28, 2019

B) Violating / Exceeding Monitors Information

(listing of all monitors in the planning area that exceeded due to this Exceptional Event, regardless of operating agency, and regardless of whether or not they are impacted by EEs)

Monitor (AQS ID and POC)	Design Value (without EPA concurrence on any of the events listed in table A above)	Design Value (with EPA concurrence on all events listed in table A above)

South Pass (56-013-0099-1)- 4/28/2019		0.065		0.065
Juel Springs (56-035-1002-1)- 4/28/2019		0.066		0.066
Big Piney (56-035-0700-1)- 4/28/2019		0.063		0.062
Moxa (56-037-0300-1)- 8/3/2018, 4/28/2019		0.066		0.066

¹ designation, classification, attainment determination, attainment date extension, or finding of SIP inadequacy leading to SIP call

² Provide additional information for types of event described as "other"

C) Summary of Maximum Design Value (DV) Monitor Information (Effect of EPA Concurrence on Maximum Design Value Monitor Determination)
(Two highest values from Table B)

	Design Value	Design Value Monitor	Comment
Maximum DV monitor (AQS ID and POC) <u>without</u> EPA concurrence on any of the events listed in table A above	0.066	South Pass (56-013-0099-1)	
Maximum DV monitor (AQS ID and POC) <u>with</u> EPA concurrence on all events listed in table A above	0.066	South Pass (56-013-0099-1)	
Maximum DV monitor (AQS ID and POC) <u>without</u> EPA concurrence on any of the events listed in table A above	0.066	Moxa (56-037-0300-1)	
Maximum DV monitor (AQS ID and POC) <u>with</u> EPA concurrence on all events listed in table A above	0.066	Moxa (56-037-0300-1)	

D) List of any monitors (AQS ID and POC) within planning area with invalid design values (e.g. due to data incompleteness)